

Portuguese original document available [here](#)

Privacy Policy

1. Introduction

Priberam's *Privacy Policy* has been revised taking into account the entry into force of the *Regulamento Geral de Proteção de Dados* [RGPD] (General Data Protection Regulation [GDPR]) on 25 May 2018 and the subsequent publication of the *Lei de Proteção de Dados Pessoais* (Personal Data Protection Act), approved by Law No. 58/2019, 8 August, which ensures the implementation of the RGPD, in the national legal order.

1.1 GDPR

The general objective of the GDPR is to establish a uniform regime for the protection and free movement of personal data of natural persons throughout the European Union, which is applied consistently and ensures a balance between the rights of data subjects and other constitutionally enshrined rights.

For your convenience there is a *LegiX® Edition* of the RGPD that Priberam makes available [here](#).

1.2 Update

This *Privacy Policy*, following the approval of legislative amendment, namely but not exclusively, may be modified accordingly at any time, without prior notice and with immediate effect. The changes will be publicised on the sites and, if necessary, requested to renew the acquaintance and consent.

Last updated: 25 July 2023

Entry into force: 25 July 2023

Previous Version: [Rev. 2023.03.EN, 09 March 2023](#) | [Change History](#)

PT version: [Rev. 2023.04, 25 July 2023](#)

2. Data Controller

Priberam Informática, S.A., legal person no. 502 237 740 (NIPC), registered at the *Conservatória do Registo Comercial de Lisboa*, under NIPC, with share capital of €60,000 (sixty thousand euros), head office in Lisbon, at Alameda D. Afonso Henriques, 41 - 2nd floor, 1000-123 Lisboa, Portugal, hereinafter referred to as Priberam.

2.1 Contacts

Site: www.priberam.com

Email: Privacy@priberam.com

Phone: +351 217 817 260 [call to the *Portuguese* landline network]

2.2 Questions and Requests

Priberam will endeavour to answer questions regarding this *Privacy Policy* as well as requests made under the terms set out below, which should preferably be sent by e-mail to the address mentioned in point 2.1.

2.3 National Authority

The CNPD – *Comissão Nacional de Protecção de Dados* (National Commission for Data Protection), whose contact details can be found at www.cnpd.pt is the competent national authority in matters involving the processing of personal data.

3. Priberam websites

Priberam websites, namely, but not exclusively Priberam.pt, Priberam.com, FLiP.pt, LegiX.pt, Dicionario.Priberam.org, monitio.com, plain-x.com, Priberam.pt/dlpo and their respective subdomains, have public areas and may have restricted areas subject to prior registration of users and/or subscription of the underlying service. Irrespective of their public or restricted nature, the use of all the Priberam websites is subject to the prior agreement and acceptance of the Generic and/or specific Terms and Conditions of each one of them, of which this *Privacy Policy* is an integral part.

Priberam's use of Cookies on its websites is explained in the [Priberam Cookie Policy](#) that forms an integral part of this *Privacy Policy*.

4. Data Collection

4.1 Principles relating to the Processing of Personal Data

This *Privacy Policy* is based on the principles relating to the processing of personal data established in article 5 of the GDPR, as well as in the subsequent execution of the processes associated with this processing.

4.2 Lawfulness of Collection and Processing

Within the scope of article 6, paragraph 1 of the GDPR, Priberam collects data within the scope of processes in which at least one of the following situations is fulfilled:

- 4.2.1 With the consent of the data subject for one or more of the specific purposes described at the time consent is requested. [subparagraph (a)]
 - 4.2.1.1 Minors: In compliance with the principle of *data minimisation* stipulated in article 5, paragraph 1 (c) of the GDPR, Priberam does not request the age of the *Data Subject*, and therefore does not know whether or not he/she is legally entitled to give his/her consent.
- 4.2.2 For the performance of a contract to which the *Data Subject* is a party, as a customer and/or user, but which, in any case, he/she can only use after having accepted the Terms and Conditions of Use of the product or service. This provision applies to both paid and free products or services. [subparagraph (b)].
- 4.2.3 In the context of pre-contractual procedures at the request of the Data Subject, in particular, but not exclusively, after requesting information, proposals or access periods for the evaluation of products and services. [subparagraph (b)]
- 4.2.4 To comply with legal obligations to which it is bound. [subparagraph (c)]

4.2.5 For the purposes of its legitimate interests [subparagraph (f)] including, but not limited to, those related to:

- a) traffic analysis on websites;
- b) the use of advertising on the sites, namely on those where services are provided free of charge and for which advertising helps to support their costs. In this context, Priberam uses Google's services, for which we suggest consulting the document ["We are committed to complying with applicable data protection laws"](#).

5. Data Usage

5.1 General Principles

Priberam's use of the data it collects respects the purpose and scope in which it was collected, as stipulated in section 4 ("Data Collection").

5.2 Clients and Users

As a *Client* or *User*, data processing is carried out in the following scopes:

- 5.2.1 For the performance of all legal obligations arising from the contracting and use of the service or product to which they relate;
- 5.2.2 For communications directly associated with the contracting and provision of the service;
- 5.2.3 To provide information about the evolution of products and services that it uses / contracts, including, but not limited to, the availability of updates and/or new versions.

5.3 Transfer of Personal Data to Third Parties

Priberam only discloses to third parties the personal data it collects, in compliance with the principle of *data minimisation* stipulated in article 5, paragraph 1 (c) of the GDPR and when technically or legally required to do so, namely, but not exclusively, in the following situations:

- 5.3.1 Transmissions related to payments and/or reporting invoices to the *Autoridade Tributária* (Tax Authority);
- 5.3.2 When communicating, whether using third-party services, for example for sending communications such as emails;
- 5.3.3 In compliance with a legal obligation to respond to a request from a competent authority, such as regulatory authorities, criminal law enforcement agencies or courts;
- 5.3.4 To take action in the legitimate interest of Priberam to defend its rights or to protect its *Clients* and/or *Users*.

6. Rights of the *Data Subject*

6.1 Revocation of the Authorisation for Treatment

At any time, the *Data Subject* may revoke the authorisation he or she has given under point 4.2.1, article 6, paragraph 1 (a) of the GDPR, without prejudice to Priberam nevertheless processing such data when:

- 6.1.1 They have been collected in the context of the conclusion of a contract (4.2.2);
- 6.1.2 Are required for the fulfilment of legal obligations (4.2.4);

6.1.3 Are essential for the proof of transactions (5.3.1);

6.1.4 Are necessary within the scope of actions to defend and/or protect the rights of Priberam, its *Clients* and/or *Users* (5.3.4).

In any event, *Revocation of the Authorisation for Treatment* shall have at least the effect of expressing the wish to object to any kind of treatment which does not fall within the exceptions set out above.

6.2 Security and Safeguarding

6.2.1 Priberam has implemented physical, computational and legal security measures to ensure the integrity of personal data and protect them against unauthorised access, use and disclosure;

6.2.2 The service providers that may be used within the scope set out in point 5.3.2 must guarantee the same level of information security assured by Priberam.

6.3 Data Access

The *Data Subject* has the right to obtain confirmation from Priberam that their data are or are not being processed and, if this is the case, the right to access them and to know the purpose of the processing to which they are subject and other information provided for under article 15 of the GDPR.

6.4 Rectification

The *Data Subject* has the right to have incorrect data rectified under the terms of article 16 of the GDPR.

6.5 Erasure ("right to be forgotten")

The *Data Subject* has the right to request the erasure of his or her data pursuant to article 17 of the GDPR. The erasure shall be made without undue delay unless the retention of the data is necessary for one of the reasons stipulated in paragraph 3 of the same article, in particular, but not exclusively, when the data:

6.5.1 They have been collected in the context of the conclusion of a contract (4.2.2);

6.5.2 Are required for the fulfilment of legal obligations (4.2.4);

6.5.3 Are essential for the proof of transactions (5.3.1);

6.5.4 Are necessary within the scope of actions to defend and/or protect the rights of Priberam, its *Clients* and/or *Users* (5.3.4).

6.6 Restriction of Processing

The *Data Subject* has the right to request the erasure of their data pursuant to article 18 of the GDPR. *Restriction of Processing* may be used instead of *erasure* when *erasure* has been requested and cannot be carried out for one of the reasons described in point 6.5.

6.7 Portability

The *Data Subject* has the right to receive from Priberam their personal data and also to have it transmitted to another *controller* party under the terms of article 20 of the RGPD.

6.8 Breach Notification

The *Data Subject* has the right to be notified in the event of a data breach likely to result in a high risk to their rights and freedoms, as stipulated and in accordance with article 34 of the GDPR.